

Lipson Neilson P.C.

9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 FAX: (702) 382-1512

LIPSON NEILSON P.C.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. THONGKHAM, ESQ.
Nevada Bar No. 12404
DAVID T. OCHOA, ESQ.
Nevada Bar No. 10414
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 - Telephone
(702) 382-1512 - Facsimile
jgarin@lipsonneilson.com
mthongkham@lipsonneilson.com
dochoa@lipsonneilson.com

*Attorneys for Defendant
Schroeter Goldmark & Bender, P.S.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware limited
liability company,

Plaintiff,

vs.

REED HEIN & ASSOCIATES, LLC d/b/a/
TIMESHARE EXIT TEAM, a Washington
limited liability company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual
and citizen of Canada; THOMAS
PARENTEAU, an individual and citizen of the
State of Washington; HAPPY HOUR MEDIA
GROUP, LLC, a Washington limited liability
company; MITCHELL R. SUSSMAN &
ASSOCIATES, an individual and citizen of
the State of California; SCHROETER,
GOLDMARK & BENDER, P.S., a
Washington professional services
corporation; and KEN B. PRIVETT, ESQ., a
citizen of the State of Oklahoma,

Defendants.

CASE NO.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT SGB'S MOTION TO
STRIKE (ECF #380) [ECF NO. 393]**

(First Request)

///

///

///

**STIPULATION AND ORDER TO EXTEND TIME TO FILE REPLY
TO PLAINTIFF'S OPPOSITION TO DEFENDANT SGB'S MOTION TO STRIKE
(ECF #380) (ECF 393)**

Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK & BENDER, P.S. ("SGB"), by and through their respective counsel, agree and stipulate as follows:

1. On January 25, 2021, SGB filed Motion to Strike [ECF 380];
2. On February 16, 2021, Plaintiff filed Opposition to Defendant SGB's Motion to Strike [ECF 393]. The deadline for SGB to reply to Plaintiff's Opposition is February 23, 2021.
3. Given the number of exhibits to the Opposition, SGB anticipates more time is required to review the documents and arguments raised therein.
4. The Parties therefore agree and stipulate that the deadline for SGB to file its reply to Plaintiff's Opposition, ECF No. 393, shall be extended for one week, up to and including Tuesday, March 2, 2021.
5. Pursuant to Local Rule 6-1(b), the Parties state the reason for the extension is to provide additional time to SGB's counsel to adequately respond to the issues raised in Plaintiff's Opposition.
6. The Parties have entered into this agreement in good faith and not for purposes of delay. This is the Parties' first stipulation for extension of this deadline. This request will not cause any prejudice to the parties in this matter.

///

///

///

///

///

///

*Diamond Resorts U.S. Collection Development, LLC v.
Reed Hein & Associates, LLC, et al.
Case No. 2:17-cv-03007-APG-VCF*

Dated this 19th day of February, 2021.

Dated this 19th day of February, 2021.

GREENSPOON MARDER LLP

LIPSON NEILSON P.C.

/s/ Phillip Silvestri

/s/ Megan H. Thongkham

Phillip A. Silvestri, Esq.
(NV Bar No. 11276)
3993 Howard Hughes Pkwy., Ste. 400
Las Vegas, NV 89169

Joseph P. Garin, Esq.
(NV Bar No. 6653)
Megan H. Thongkham, Esq.
(NV Bar No. 12404)
David T. Ochoa, Esq.
(NV Bar No. 10414)
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144

Richard W. Epstein, Esq.
(Admitted Pro Hac Vice)
Jeffrey Backman, Esq.
(Admitted Pro Hac Vice)
Michelle E. Durieux, Esq.
(Admitted Pro Hac Vice)
200 East Broward Blvd., Ste. 1800
Fort Lauderdale, FL 33301

*Attorneys for Defendant
Schroeter Goldmark & Bender, P.S.*

and

COOPER LEVENSON, P.A.
Kimberly Maxson-Rushton, Esq.
NV Bar No. 5065
Gregory A. Kraemer, Esq.
NV Bar No. 1091
1835 Village Center Circle
Las Vegas, NV 89134

Attorneys for Plaintiff

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: February 19, 2021

Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 FAX: (702) 382-1512